

AFFIDAVIT OF JOHN OLIVEIRA

I, John Oliveira, do hereby depose and state as follows:

1. I am a Police Officer with the Somerville Police Department and have been so employed for twenty years. In 2000, I was assigned to the Detective Bureau of the Somerville Police Department. In June 2008, I was assigned to the FBI Violent Crimes Task Force ("Task Force"). The Task Force is comprised of personnel from the FBI, Massachusetts State Police, Boston, Somerville, Malden, and Saugus Police Departments. The Task Force investigates bank robberies, as well as violent crimes, which are punishable under federal and state law.

2. During my tenure as a law enforcement officer, with both the Somerville Police Department and the Task Force, I have interrogated numerous defendants, informants, and suspects who were users, sellers and/or distributors of controlled substances and who also had violent criminal records. I have additionally been involved in numerous investigations involving assaults, larcenies, extortion, arson, firearms violations, armed and unarmed robberies, prostitution, homicides and crimes against persons. Since joining the Task Force, I have investigated or assisted with hundreds of bank robbery investigations. I have been the affiant in multiple search warrants, both State and Federal.

3. I am aware that Title 18, United States Code, Section 2113(a) makes it a crime for anyone by force and violence, or by intimidation, to take, or attempt to take, from the person or presence of another, any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of any federally insured bank.

4. I make this affidavit in support of a criminal complaint charging Gregory Carter ("Carter") DOB xx/xx/1959 with the robbery of a branch of the Santander Bank ("the Santander Bank") located at 552 Commonwealth Avenue, Boston, Massachusetts, on March 25, 2017. On the date of the robbery, the Santander Bank was insured by the Federal Deposit Insurance Corporation. The facts stated herein are known to me through the investigation and through observations made by others with whom I have spoken. This affidavit does not contain all the facts known to me but rather only those which are sufficient to establish probable cause that Gregory Carter committed the above-mentioned bank robbery.

SANTANDER BANK, March 25, 2017

5. On Saturday, March 25, 2017, at approximately 9:39 a.m., an individual entered a branch of the Santander Bank, located at 552 Commonwealth Avenue, Boston, Massachusetts. The individual approached a teller and held up a note indicating a robbery. The individual ("the robber") also stated words to the

effect that he had a gun and repeatedly gestured to his pocket. During the robbery, the robber pulled down a facemask he was wearing which exposed his skin and a thin moustache. The teller handed the individual currency from her drawer. The robber then fanned through the money, exits the bank, and is observed running towards Beacon Street in the direction of the Buckminster Hotel.

6. Following the robbery, the teller who had interacted with the robber was interviewed. The teller described the robber as a light-skinned black male with a thin moustache, approximately 5'10" tall, wearing a dark hat, a black ski mask, sunglasses, a black "puffy" jacket, and blue latex gloves.

7. Bank surveillance cameras were functioning and operating on the date of the robbery. The surveillance cameras captured images of the robber as he entered the bank, interacted with the teller, and then exited the bank. The robber is observed wearing a black "puffy" jacket, gray-t-shirt, black pants, black hat, dark shoes, a black ski-mask, and blue latex gloves

8. A post-robbery audit determined that the robber had taken \$6,129.00 in United States currency during the robbery.

9. Following the robbery, law enforcement officers canvassed the area and noted exterior video surveillance cameras on buildings adjoining the bank. The officers learned that

these video cameras were functioning and operating on the date of the robbery. The officers obtained and viewed the surveillance videos. A few minutes prior to the robbery, the officers observed a black Ford Fusion sedan ("the Subject Vehicle") operating on Beacon Street. They observed the Subject Vehicle park in the vicinity of the Buckminster Hotel on Beacon Street. A few minutes later, they observed a male wearing a dark jacket and dark pants exit the Subject Vehicle, walk in the direction of, and then enter the Santander Bank. A few minutes later the same individual is observed exiting the Santander Bank and walking in the direction of the Subject Vehicle on Beacon Street. The individual is then observed walking a few feet past the Subject Vehicle, then returning to the Subject Vehicle, opening the Subject Vehicle's trunk, closing the trunk, getting into the driver's side of Subject Vehicle, and then exiting the area.

10. I have observed the surveillance video from inside the Santander Bank and compared that video to the video from the exterior surveillance video from the businesses adjoining the bank. The individual who exits the Subject Vehicle, walks towards then enters the Santander Bank, then exits the bank, and then enters into and drives away in the Subject Vehicle is the same individual, the robber.

11. Following the robbery, information regarding the robbery, a description of the robber, and the Subject Vehicle were posted on the Boston Regional Intelligence Center's (BRIC) Website. This website provides state and federal law enforcement throughout the Commonwealth with information of recent crimes and updates on ongoing investigations.

THE IDENTIFICATION OF GREGORY CARTER

12. On March 28, 2017, at approximately 12:30 p.m., Detective Sergeant Matthew McDonnell ("McDonnell") of the Brookline Police Department was investigating an unrelated matter at the intersection of Dudley and Washington Streets in Boston, Massachusetts. McDonnell, who was aware of the recent information furnished on the BRIC relative to the robbery of the Santander Bank described above, observed a black Ford Fusion operating on Dudley Street. McDonnell noted that the vehicle and operator fit the description of the Subject Vehicle and individual involved in the March 25, 2017 robbery of the Santander Bank.

13. As McDonnell was observing the Subject Vehicle, he noted that the operator stopped the Subject Vehicle, exited the Subject Vehicle, and began walking down Dudley Street in the direction of a branch of the Bank of America. McDonnell noted that as the individual approached the bank, a marked Boston Police cruiser pulled in front of the bank and stopped. At this

time, the individual stopped, turned around and proceeded to walk back towards the Subject Vehicle. As the individual approached the Subject Vehicle, a second individual, later described as a black/Hispanic male, approached him and started talking. The two individuals stood outside the Subject Vehicle for 10 minutes talking before the second individual walked away. The first individual then entered the Subject Vehicle and left the area.

14. McDonnell noted that the Subject Vehicle bore Massachusetts registration number XXX515. The registration was queried with the Massachusetts Registry of Motor Vehicles and it was determined that the vehicle was registered to Carter. A criminal record check revealed that Carter is currently on probation with the US Probation Department in Boston, having been convicted of bank robbery.

15. On Saturday, April 8, 2017, law enforcement officers conducted surveillance on Carter. They observed him parking the Subject Vehicle and then entering the New Horizons Medical Clinic ("the Clinic"), located at 1180 Beacon Street, Brookline, Massachusetts. Approximately one hour later, they observed Carter exit the Clinic, return to the Subject Vehicle, and then exit the area.

16. The Clinic is approximately .5 mile from the branch of the Santander Bank that was robbed on March 25, 2017.

17. Law enforcement officers spoke to representatives at the Clinic and learned that the Clinic is equipped with interior video surveillance cameras. These surveillance cameras were functioning and operating on the date of March 25, 2017.

18. Law enforcement officers viewed the Clinic's interior surveillance video from the date of March 25, 2017, and they observed an individual enter the building's hallway at approximately 9:00 a.m. and exit the building at approximately 9:26 a.m. The individual is a light-skinned black male, with a thin moustache, approximately 5'10" tall, wearing a black "puffy" jacket, gray t-shirt, black pants, and dark colored shoes.

19. The Santander Bank on Commonwealth Avenue was robbed at approximately 9:39 a.m. on the morning of March 25, 2017.

20. I have compared the surveillance video from the Clinic on March 25, 2017, and the surveillance video from Santander Bank on the morning of March 25, 2017. The individual I observed in both surveillance videos is a light-skinned black male with a thin moustache, wearing a black puffy jacket with a white insignia on the left breast and back collar, a gray t-shirt, black cargo pants, and black shoes. I believe the individual in both videos is the same individual, Carter.

CONCLUSION

21. Based on the foregoing, I submit there is probable cause to believe that on March 25, 2017, Gregory Carter, by force and violence, and by intimidation, took from the person or presence of another, money in the care, custody, control, management, and possession of Santander Bank, a bank insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. § 2113(a).



JOHN OLIVEIRA
TASK FORCE OFFICER, FBI

Sworn and subscribed to before me this 24th day of May 2017.



M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE

